

APPENDIX A RECURRING REVIEW REPORT TEMPLATE

A-1. Introduction. This appendix provides a checklist and report template for Recurring Review Reports. The checklist appears first, followed by the report template. Each report should take into account site-specific circumstances, and the report format and content should be modified accordingly. For example, there may be site-specific questions that are not specifically addressed in the checklist /template presented in this appendix but that should be included in the Recurring Review Report. At a minimum, the report will include all applicable information described in the checklist and template.

a. Table A-1 is a checklist that may be used to verify that all appropriate information has been included in the Recurring Review Report. Depending on site-specific circumstances, some items may not be applicable.

b. The suggested format for Recurring Review Reports is presented in the report template, which also provides additional detail on the content of each section. The template provides details on the content of each section, boilerplate text, example tables, and protectiveness statements. Suggested boilerplate text is presented in text boxes. Within the boilerplate section, text enclosed in brackets (“[]”) should be added as appropriate, and *italicized* text denotes discussions that the reviewer should add.

c. Use both the checklist and report template as guides for the types of information that should appear in the different sections of the Recurring Review Report. Also include information that is relevant to the site and needed to ensure that the rationale behind the protectiveness determination is adequately documented.

Table A-1
Content Checklist for
Recurring Review Reports for OE Response Actions

Project Name: _____

Project Location: _____

Preparer's Name and Title: _____

Date of Preparation: _____

Reviewer's Name and Title: _____

Date of Review: _____

	Y	N	N/A
Title page with signature and date	_____	_____	_____
Signed concurrence memorandum (if applicable)	_____	_____	_____
Table of Contents			
• List of tables	_____	_____	_____
• List of figures	_____	_____	_____
• List of acronyms	_____	_____	_____
• List of appendices	_____	_____	_____
Executive Summary			
• Recurring Review Summary	_____	_____	_____
Introduction			
• Site name, location and FUDS number	_____	_____	_____
• Date of the Recurring Review	_____	_____	_____
• Purpose of the Recurring Review	_____	_____	_____
• Review number (e.g., first, second, etc.)	_____	_____	_____
– date that the on-site field work for the selected response action began (i.e., "trigger date")	_____	_____	_____
– date of the previous review (if applicable)	_____	_____	_____

	Y	N	N/A
Introduction (continued)			
• If review covers only a portion of the site, define what areas are covered in the Recurring Review and summarize the status of other areas	_____	_____	_____
• List of Project Delivery Team Members	_____	_____	_____
– Organizations providing analyses in support of the review (e.g., the contractor supporting the lead agency)	_____	_____	_____
– Other review participants or support agencies	_____	_____	_____
Site Chronology and Description			
• Chronological list of site history, including all important site events such as the date of initial discovery of problem and milestone dates for the OE response action at the site (e.g., list of documents created during the removal or remedial response process such as the EE/CA or RI/FS report, decision documents, etc.).)	_____	_____	_____
• Physical characteristics of the site (e.g., size, topography, and geology)	_____	_____	_____
• Land use history (e.g., former, current, and future land use(s) of the site and surrounding areas)	_____	_____	_____
• Site investigations	_____	_____	_____
• Response action			
– Regulatory actions	_____	_____	_____
– Response action objectives	_____	_____	_____
– Response selection	_____	_____	_____
– Response description	_____	_____	_____
– Response implementation (e.g., status, history)	_____	_____	_____

Y **N** **N/A**

Recurring Review Process

- | | | | |
|--|-------|-------|-------|
| <ul style="list-style-type: none"> ● Administrative Components – Notification of potentially interested parties of initiation of review process – Identification of PDT members – Outline of components and schedule for the Recurring Review ● Community Notification and Involvement – Community notification (prior and post review) – Other community involvement activities (e.g., notices, fact sheets, etc., as appropriate) – Stakeholder and Regulator Input <ul style="list-style-type: none"> ○ Summary of actions taken to provide information to and solicit input from stakeholders and regulators (e.g., public notices, direct mailings, meetings, interviews, etc.). ○ Regulator and stakeholder concerns ○ A copy of significant stakeholder correspondence, minutes from public meetings, interview forms, etc. should be included as an appendix. ● Summary of Information Gathered and Relied Upon – Existing information/documentation review (summary of existing documentation that was reviewed, information gathered during the site visit, and information gathered from stakeholders and regulators) – New information (e.g., photographs from the site visit that illustrate current site conditions, information provided by stakeholders and regulators, incident reports, etc.) | <hr/> | <hr/> | <hr/> |
|--|-------|-------|-------|

Y **N** **N/A**

Recurring Review Process (continued)

- If a determination of Technical Impracticability was made for the site, discuss whether new technology is now available that could address remaining explosives safety risks at the site
- _____
 - _____
 - _____
- Progress Since Last Recurring Review (if applicable)
 - Protectiveness statements from last review
 - Status of recommendations and follow-up actions from last review
 - Results of implemented actions, including whether they achieved the intended effect
 - Status of any other prior issues
- _____
 - _____
 - _____
 - _____
- Interviews
 - Interview date(s) and location(s)
 - Interview participants (name, title, and other contact information)
 - Interview documentation
 - Interview summary
- _____
 - _____
 - _____
 - _____
- Site Visit Findings
 - Date of Site Visit
 - Site Visit participants
 - Site visit scope and procedures
 - Site visit observations and conclusions
 - Maps, drawings, tables and photos (as necessary)
- _____
 - _____
 - _____
 - _____
 - _____

	Y	N	N/A
Final Site Analysis			
• Answer Question 1: Is the response functioning as intended?	_____	_____	_____
• Answer Question 2: Are any assumptions used at the time of response selection still valid?	_____	_____	_____
• Answer Question 3: Does new information indicate that the previously selected response is no longer protective of human health, safety, and the environment considering the best available technology?	_____	_____	_____
• In answering these questions, include:			
– Description of whether the response action continues to meet the response objectives.	_____	_____	_____
– Description of any changes noted at the site and what impact they have on the protectiveness of the response (e.g., physical changes, changes in land use at the site or adjacent properties, changes in public accessibility, technology changes, etc.)	_____	_____	_____
– Analysis of the current protectiveness of the OE response action based on the information gathered during the Recurring Review.	_____	_____	_____
Conclusions/Recommendations			
• Response Deficiencies	_____	_____	_____
• Conclusions			
– Protectiveness statement for each sector or area of the site, as appropriate (i.e., statement as to whether the response continues to minimize explosives safety risks and continues to be protective of human health, safety and the environment)	_____	_____	_____

Y N N/A

Conclusions/Recommendations (continued)

- Recommendations/Follow-up Actions

- If it is determined that the response is not currently protective or risk-related concerns are identified, include recommendations for follow-up actions to address the deficiencies. The report should indicate that the follow-up actions were identified and developed by the PDT in conjunction with stakeholders and regulators.

- Responsibility Matrix

- Recommended follow-up actions
- Parties responsible for further action (i.e., for developing, implementing, and overseeing the actions)
- Target dates (i.e., schedule for completion of actions related to resolution of issues)

- Next Review

- Expected date of next review
- Proposed changes to the scope of subsequent reviews
- If the PDT has determined that no further Recurring Reviews will be conducted at the site, provide a discussion of the justification for termination and documenting agreement among the PDT, stakeholders and regulators.

EP 75-1-4
31 Oct 03

Recurring Review Report

(First, Second, etc.) Recurring Review Report

for

Site Name

FUDS Number

City

County, State

Month, Year

PREPARED BY:

Lead Agency
Name and
Location

Approved by:

Date:

[Name]

[Title]

[Affiliation]

Signed Concurrence Memorandum

If concurrence was obtained from the appropriate regulators, include a signed concurrence memorandum.

Recurring Review Report

Site Name
FUDS Number
City
County, State

The following Table of Contents notes typical major divisions and subheadings for Recurring Review reports. Subheadings can be included as appropriate for a given review report. This is only a general example.

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5.0 Conclusions/Recommendations.....	A-19

List of Tables

List of Figures

List of Appendices

List of Acronyms

You should include a list of acronyms used in the report.

Executive Summary

You should include an Executive Summary at the beginning of the report. The Executive Summary should be brief, and should include a reiteration of the protectiveness statements included in Section 5.0 (Conclusions/Recommendations) of the Recurring Review Report.

Sample Format for Recurring Review Summary

SITE IDENTIFICATION		
Site name:		
FUDS Number:		
City:	County:	State:
SITE STATUS		
Selected Response Action Description:		
Response Action Status (choose all that apply): <input type="checkbox"/> Under Construction <input type="checkbox"/> Complete		
Initiation Date of On-site Field Work for Response Action Implementation: ____ / ____ / ____		
Completion Date for Response Action Implementation: ____ / ____ / ____		
Does the site include multiple Sectors/Areas? <input type="checkbox"/> YES <input type="checkbox"/> NO If yes, list the areas included in this Recurring Review: _____ _____ _____	Has site been put into reuse? <input type="checkbox"/> YES <input type="checkbox"/> NO	
REVIEW STATUS		
Lead agency: _____		
Author/District PM name:		
Author/District PM title:	Author affiliation:	
Review period:** ____ / ____ / ____ to ____ / ____ / ____		
Review number: <input type="checkbox"/> 1 (first) <input type="checkbox"/> 2 (second) <input type="checkbox"/> 3 (third) <input type="checkbox"/> Other (specify) _____		
Date(s) of site visit: ____ / ____ / ____		
Triggering date: ____ / ____ / ____		
Due date for initiation of this Recurring Review: ____ / ____ / ____		

Sample Format for Recurring Review Summary, cont'd.

Summary of Findings and Final Site Analysis:

Summarize findings and Final Site Analysis (see Chapters 3 and 4)

Conclusions/Recommendations and Follow-up Actions:

Summarize conclusions/recommendations and follow-up actions (see Chapter 5).

Protectiveness Statement(s):

Other Comments:

Recurring Review Report

1.0 Introduction

Provide a synopsis of “who, what, where, when, and why.” Detail the following:

- *The site name, location and FUDS number (include site location figure);*
- *The purpose of the review;*
- *Who conducted the review, when, and for what site or portion of the site;*
- *Whether it is the first review or a subsequent review at the site, including the date that the on-site field work for the selected response action began (i.e., “trigger date”) and the date of the previous review (if applicable);*
- *A brief status of areas of a site not addressed in the current review and/or the status of Recurring Reviews for other areas of the entire site.*

1.0 Introduction

The United States Army Corps of Engineers (USACE) has conducted a Recurring Review for the Ordnance and Explosives (OE) Response Action at [site name] [FUDS number] in [city, county, state]. The site location is illustrated in Figure 1.1. The [name of the areas of the site included in the review] is the subject of this review. The location(s) of the area(s) included in this review are illustrated in Figure 1.2.

The purpose of a Recurring Review for an OE response action is to determine whether the response action at a site continues to minimize explosives safety risks and continues to be protective of human health, safety, and the environment. The methods, findings, and conclusions of the review are documented in this report.

The Recurring Review was conducted from [start date] to [finish date] and is the [number of review, i.e., first, second, etc.] Recurring Review for this site. On-site field work for the selected response action at this site began on [date]. The previous review was conducted in [year of previous review].

The [USACE District] conducted the Recurring Review. The members of the Project Delivery Team (PDT) that conducted the review, including their titles and contact information, are provided in Table 1.1.

If the Recurring Review does not include an entire site, also provide a brief synopsis of the status of response actions and/or Recurring Reviews for other areas.

2.0 Site Chronology and Description

List all important site events and relevant dates in the site chronology, such as those shown in Table 2.1. The identified events are illustrative, not comprehensive.

Table 2.1: Chronology of Site Events

Event	Date
Preliminary Assessment of Eligibility	
Site Inspection (incl. work plans and reports)	
Archives Search Report	
Time Critical Removal Actions	
Engineering Evaluation/Cost Analysis (EE/CA) or Remedial Investigation/Feasibility Study (RI/FS)	
Decision Document	
Explosives Safety Submissions	
Response Implementation	
Site-specific Response Report	
Previous Recurring Reviews	

Describe the fundamental aspects of the site, including:

- *Physical characteristics of the site (e.g., size, topography, and geology);*
- *Land use history (e.g., former, current, and future land use(s) of the site and surrounding areas);*
- *Summary of site investigation history and findings; and*
- *Description of the selected response action, including response action objectives, response selection, response implementation, and basis for taking response. You should delineate all response measures, for instance, include land use controls. Discuss any changes to or previously identified problems with the response.*

This information can be taken directly from existing site documents.

3.0 Recurring Review Process

Describe activities performed during the Recurring Review process and provide a summary of findings when appropriate. Include the following information:

- *Administrative Components*
 - *Notification of potentially interested parties of initiation of review process*
 - *Identification of PDT members*
 - *Outline of components and schedule for the Recurring Review*
- *Community Notification and Involvement*
 - *Community notification (prior and post review)*
 - *Other community involvement activities (e.g., notices, fact sheets, etc., as appropriate)*
 - *Stakeholder and Regulator Input*
 - *Summary of actions taken to provide information to and solicit input from stakeholders and regulators (e.g., public notices, direct mailings, meetings, interviews, etc.).*
 - *Regulator and stakeholder concerns*
 - *Include a copy of significant stakeholder correspondence, minutes from public meetings, interview forms, etc. as an appendix to the report.*
- *Summary of Information Gathered and Relied Upon*
 - *Existing information/documentation review*
 - *Provide a list of the existing documentation that was reviewed and the location of this information;*
 - *Describe existing information gathered during the site visit and information gathered from stakeholders and regulators.*
 - *New information*
 - *Include a description of new information that is not already included in the project files but which is necessary to support the findings of the Recurring Review. This may include photographs from the site visit that illustrate current site conditions, information provided by stakeholders and regulators, and incident reports.*
 - *Include this new information as an appendix to the report.*
 - *If a determination of Technical Impracticability was made for the site, discuss whether new technology is now available that could address remaining explosives safety risks at the site.*
- *Progress Since the Last Recurring Review*

- *Protectiveness statements from the last review;*
- *Status of recommendations and follow-up actions from last review;*
- *Results of implemented actions, including whether they achieved the intended effect; and*
- *Status of any other prior issues*

Table 3.1 below presents one approach for providing information on the recommendations and follow-up actions stated in the past review and subsequent actions. The accompanying text should also discuss why any recommendations and follow-up actions have not been implemented if that is the case, and whether implemented actions achieved desired results.

Table 3.1: Actions Taken Since the Last Recurring Review

Issues from Previous Review	Recommendations/ Follow-up Actions	Party Responsible	Milestone Date	Action Taken and Outcome	Date of Action

- *Interviews*
 - *Provide a summary of interviews conducted to obtain new information about the site including:*
 - *Interview date(s) and location(s)*
 - *Interview participants (name, title, and other contact information)*
 - *Interview documentation*
 - *Interview summary*
 - *Include a detailed description of each interview in an appendix.*
- *Site Visit Findings*
 - Date of Site Visit*
 - Site Visit participants*
 - Site visit scope and procedures*
 - Site visit observations and conclusions*

–Maps, drawings, tables and photos (as necessary)

4.0 Final Site Analysis

Provide an analysis of the current protectiveness of the OE response action based on the information gathered during the Recurring Review. In the analysis, provide the answers to the three questions that the Recurring Review is intended to address:

- Is the response functioning as intended?*
- Are any assumptions used at the time of response selection still valid?*
- Does new information indicate that the previously selected response no longer minimizes explosives safety risks and/or is no longer protective of human health, safety, and the environment considering the best available technology?*

Provide the information that presents the basis for each answer as a framework for your protectiveness determination(s):

- Description of whether the response action continues to meet the response objectives.*
- Description of any changes noted at the site and what impact they have on the protectiveness of the response (e.g., physical changes, changes in land use at the site or adjacent properties, changes in public accessibility, technology changes, etc.).*
- Analysis of the current protectiveness of the OE response action based on the information gathered during the Recurring Review.*

Explain the conclusions of your review, based on the information presented in the previous section.

5.0 Conclusions/Recommendations

Develop a protectiveness statement for each sector included in the Recurring Review. This will be a statement as to whether the response continues to minimize explosives safety risks and continues to be protective of human health, safety and the environment.

Explain and provide supporting rationale of the protectiveness determination. This will include a description of any response deficiencies that were noted during the Recurring Review. Address all issues that affect current and/or future protectiveness.

If it is determined that the response is not currently protective or risk-related concerns are identified, include recommendations for follow-up actions to address the deficiencies. These follow-up actions will be identified and developed by the PDT in conjunction with stakeholders and regulators. Develop a responsibility matrix that identifies the parties responsible for implementing and overseeing actions, milestone dates, etc.. Table 5.1 illustrates one way to include the necessary information.

Table 5.1: Conclusions/Recommendations

Issue	Recommendations and Follow-up Actions	Party Responsible for Implementation	Party Responsible for Oversight	Milestone Date

Document the year of the next Recurring Review for the site and any proposed changes to the scope. If the PDT has determined that no further Recurring Reviews will be conducted at the site, provide a discussion of the justification for termination and document agreement among the PDT, stakeholders and regulators.

Suggested protectiveness statements are provided below.

A. Response action is under construction:

Protective or will be protective:

“The response action at [area X of site X] is expected to be effective in minimizing explosive safety risks and protective of human health, safety and the environment upon completion, and in the interim, conditions that could result in unacceptable risks are being controlled.”

Not protective:

“The response action at [area X of site X] is not protective because of the following issues [describe the issue(s)]. The following actions need to be taken [describe the actions needed to ensure protectiveness].”

Protectiveness deferred:

“A protectiveness determination of the response at [area X of site X] cannot be made at this time until further information is obtained. Further information will be obtained by taking the following actions [describe the actions]. It is expected that these actions will take approximately [insert time frame] to complete, at which time a protectiveness determination will be made.”

B. Response action at the OU is operating or completed:

Protective:

“The response action at [area X of site X] continues to minimize explosives safety risks and continues to be protective of human health, safety and the environment.”

Not protective:

“The response action at [area X of site X] is not continuing to minimize explosives safety risks and is not continuing to be protective of human health, safety and the environment because of the following issue(s) [describe the issue(s)]. The following actions need to be taken [describe the actions needed to ensure protectiveness].”

Protectiveness deferred:

“A protectiveness determination of the response at [area X of site X] cannot be made at this time until further information is obtained. Further information will be obtained by taking the following actions [describe the actions]. It is expected that these actions will take approximately [insert time frame] to complete, at which time a protectiveness determination will be made.”

Appendices

- Site maps (if not included in the body of the report)
- List of documents reviewed and their location
- New information obtained during the Recurring Review that is not currently a part of the project files
- Interview forms
- Photos Documenting Site Conditions
- Copies of significant stakeholder correspondence, community outreach materials, minutes from public meetings, interview forms, etc.
- Comments received from stakeholders